

**NOVA ELECTRONICS  
BOX 740482  
DALLAS, TEXAS 75374  
214-725-5621**

**Comments on NPRM RM-11338  
FCC 07-144**

I am writing in support of NPRM 07-144. My reasons are multiple, and will be outlined below. Primarily, I believe AM stations should be allowed access to FM translator licenses, and current FM translator rules amended to limit coverage.

1. Many AM stations presently have severe disadvantages in coverage due to a myriad of reasons. Primarily, many stations have little or no nighttime coverage due to power limitations necessary to reduce interference. These stations are at a competitive disadvantage over other stations with greater night power levels. This proposal would help level the playing field and also give the daytime stations better financial viability in an ever-increasing media marketplace. Many small town stations would then have the opportunity to present local civic and sporting events, which presently they have no ability to broadcast. This would greatly support the Commission's push for localism in these markets, and even larger ones.

2. With the authorization of nighttime IBOC operations, many low powered stations will be (and are being) impacted by digital interference, which under normal circumstances would be prohibited under FCC rules as causing harmful interference. These stations so impacted could resort to FM translators to overcome this harmful (but now legal) interference and regain lost nighttime (and perhaps even daytime) audience share. This again would give them a competitive standing on the airwaves and assist their financial viability.

3. AM stations granted the ability to apply for FM translator licenses will face a daunting challenge of finding an available frequency, owing to the fact of an unbridled NCE FM translator proliferation due to ridiculously lax regulations regarding said stations. The proposed AM translator rules restrict said station's FM translator coverage area to a maximum of 35 mile radius of the primary transmitter site, depending on which proposal is passed. If this distance restriction is included in the final legislation, I propose that the current NCE FM translator rules be likewise amended to

reflect a similar restriction. The current practice of an FM primary station existing in Florida and operating translators in California is patently absurd, and should have never been allowed to happen in the first place. I propose that existing NCE FM translators would remain unchanged until their next license renewal, at which time these licenses would expire without renewal. The resulting attrition would free up thousands of frequencies for AM translators and LPFM licensees. This would bring great diversity into the broadcasting spectrum, and end the virtual monopoly of translator frequencies currently held by a handful of religious broadcasters who are inserting their programming into vastly foreign markets from their primary licensed stations. Let me at this time strongly emphasize that this is in no way to be construed as an attack on religious broadcasting. The overwhelming majority on my clients and employers over 35+ years in broadcast engineering have been (and continue to be) religious broadcasters. I would make this same opposition were the monopolizing owners secular broadcasters, as this objection has absolutely nothing to do with content.

In conclusion, I believe the proposal to authorize FM translators to AM stations is of great benefit to the broadcast industry, and with the concurrent adoption of common sense distance restrictions on NCE FM translators, will spur diversity, economic opportunity and alleviate congestion in the FM band while expanding coverage of disadvantaged stations to their intended local audience.

Respectfully submitted,  
Mike Vanhooser, President